



Regulatory Section

Logs, Posts, Pulpwood, Bark, and Bark Products

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Lists of Commercial Products

At establishments operating under Compliance Agreements (CAs), employees of the establishments may inspect and certify the following commercial products:

- ◆ Logs (includes logs for veneer, saw timber, etc.)
- ◆ Posts
- ◆ Pulpwood (includes bolts, edgings, trimmings, slabs, etc.)
- ◆ Bark and bark products
- ◆ Other forest products

Alone or together, APHIS and State personnel will monitor the CAs.

Operation under Compliance Agreements

Employees will only be able to inspect and certify when their establishment is under a CA and when the employees have successfully completed training. Examples of CAs are in [Appendix G](#).

PPQ officers and/or State personnel will train the employees of the cooperating establishments.

Operating under CAs after successfully completing training, employees will be able to do the following:

- ◆ Inspect logs according to a standardized procedure
- ◆ Ship pulpwood and bark products according to a standardized procedure
- ◆ Treat, if necessary, in a safe and effective manner
- ◆ Complete the appropriate documents

On an as-needed basis, PPQ officers and/or State personnel will monitor the employees of the cooperating establishments to ensure compliance.

Inspection Procedures for Logs



If inspections are not practical because of costs or some other factor, logs can be debarked to remove all the life stages.

Log inspectors (whether PPQ officers, State personnel, or employees of cooperating establishments) will examine all the surface area—100% inspection—of each log in the shipment.

During the piece-by-piece inspection, inspectors will examine all exposed surfaces and crevices for egg masses, larvae, and pupae. If any life stage of gypsy moth is present, inspectors will apply, before shipment, a suitable treatment listed in the subsection on Treatments.

Two methods, the “laid out” and the “loader” method, allow examination of all the surface area of all the logs.



Both methods involve work in a log-handling yard, so obey the following safety precautions:

- ◆ Always wear a hardhat and steel-toe workboots
- ◆ Always listen and watch for yard equipment
- ◆ Because log stacks are often unstable, never go on or near log stacks.

The procedures for a “laid out” inspection and a “loader” inspection are on the following pages.

The “Laid Out” Method of Inspection

Using this method, inspectors will examine the logs when the logs are “laid out,” that is, the logs will be arranged in parallel rows with 3 to 4 feet between the rows.

The procedure for a “laid out” inspection follows:

1. Plan in advance to have the logs “laid out” and personnel and equipment on hand to turn the logs.
2. Walk between the rows examining the upper surface of logs in the near row and the side surface of logs in the next row. If eggs masses are found, spray with Golden Natur'l Spray Oil and remove. If larvae or pupae are found, remove the larvae and pupae.
3. Have the logs turned, so that the upper surface becomes the bottom.
4. Repeat Step 2 and examine (and treat if necessary) the surfaces that were not previously examined.
5. Safeguard the logs by arranging immediate shipment by shippers under CA or storage under cover followed by shipment by shippers under CA.
6. Document the inspection.

The “Loader” Method of Inspection

Using this method, inspectors will examine the logs when the logs are held by a loader. This method is only to be used, when space does not allow the logs to be “laid out.”



There is considerable risk of injury to the inspectors using the “loader” method. Inspectors must never be directly under the log. Inspectors must always remain off to the side.

The procedure for a “loader” inspection follows:

1. Plan in advance to have the loader and personnel on hand.
2. Examine each log when held 3 to 4 feet off the ground. If egg masses are found, spray with Golden Natur'l Spray Oil and remove using a long-handled wire brush. If larvae or pupae are found, remove the larvae and pupae.
3. If necessary, have the loader turn the log over.
4. If necessary, repeat Step 2 and examine (and treat if necessary) the surfaces that were not previously examined.

5. Repeat Steps 2 through 4 to examine all the logs.
6. Safeguard the logs (1) by arranging immediate shipment using shippers under CAs or (2) by storing under cover followed by shipment by shippers under CAs.
7. Document the inspection.

Logs may be moved when (1) all the surface area is inspected and (2) the logs are either free of life stages or treated to eliminate the life stages.

Time of Inspection

During the five months from April through August, inspection and treatment, if necessary, must be done no more than five days prior to shipment, preferably on the shipping day. If the inspected logs are not shipped immediately, the establishment must safeguard the logs to prevent infestation or reinfestation of the logs. The establishment can safeguard the logs by storage in closed containers or by storage at least 100 feet from vegetation.

During the seven months from September through March, inspection and treatment, if necessary, must be done 14 days or less prior to shipment, provided the logs are shipped before April.

Shipment under CAs

Shippers under CAs will be able to move logs; the criteria in the CAs will regulate the shipping practices. [Appendix G](#) contains an example of a CA for shippers.

Receiving Mills under CAs

Receiving mills in non-infested areas will be able to receive logs if the receiving mills are under CAs which regulate handling practices; in addition, the receiving mills must accept logs only from loggers under CAs and shippers under CAs. [Appendix G](#) contains an example of a CA for a receiving mill.

Inspection Procedures for Pulpwood and Bark

Inspection Procedures

Inspectors (whether PPQ officers, State personnel, or employees of cooperating establishments) will not be able to examine all the surface area of the shipment.

Pulpwood and bark may be moved if (1) fumigated or (2) moved to receiving mills under CAs by shippers under CAs.

Fumigation

See [Treatments](#) subsection or the PPQ *Treatment Manual*.

Movement to Receiving Mills

Movement of pulpwood and bark from a generally infested area to a non-infested area involves special handling by (1) employees at the sending site, (2) employees of the shipping companies, and (3) employees at the receiving mill.

Employees at establishments which ship from a generally infested area must inspect the shipment to ensure the following:

- ◆ Shipments will only go to receiving mills under CAs when the receiving mills are in non-infested areas
- ◆ Only shippers who are under CAs will transport the regulated articles
- ◆ Shipments will leave the generally infested area covered during the blow-in season (April to August)
- ◆ Shipments will leave the generally infested area covered with complete documentation.

Employees of shipping companies must inspect the shipment to ensure the following:

- ◆ Shipments when originating in generally infested areas will only go to receiving mills in non-infested areas when the receiving mills are under CAs
- ◆ Shipments will go under cover and without delay.

Employees of the receiving mills under CAs must inspect to ensure the following:

- ◆ Shipments from generally infested areas will arrive from suppliers under CAs and with correct documentation
- ◆ Shipments will arrive under cover and without delay

- ◆ Shipments from generally infested area will be processed immediately (preferably) or within five days during the five months from April through August.

Treatments

Treatments are discussed in the Reference subsection on [page 8-1](#).

Procedures for composting bark are in [Appendix N](#).

Hazardous Site Classification

Under the CAs, establishments which frequently ship logs, pulpwood, bark, or any forest producer out of a generally infested area will provide access to PPQ and/or State employees to examine the premises (including all regulated articles) and the surrounding areas.

The [Hazardous Sites](#) subsection contains information on (1) scouting the premises and the surrounding area of an establishment and (2) classifying an establishment.

Documentation

To ship logs, pulpwood, or bark, three types of documents are acceptable:

1. PPQ Form 540 (Certificate)

For use by PPQ Officers and State personnel

2. PPQ Form 530 (Limited Permit)

For use by PPQ Officers and State personnel

3. A signed [Accurate Statement](#)

For use by inspectors employed by cooperating establishments

Signed Accurate Statement

[Appendix O](#) contains an Accurate Statement for logs and an Accurate Statement for pulpwood (or bark).